

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

Olga Martinez Torres and Linda Davis, on behalf
of themselves and all others similarly situated,

Plaintiffs,

vs.

American Airlines, Inc., the Employee Benefits
Committee and John/Jane Does 1-5

Defendant.

Civil Action No.: 4:18-cv-00983-O

CLASS ACTION

UNOPPOSED MOTION TO JOIN PARTIES PURSUANT TO FED. R. CIV. P. 20

Plaintiffs Olga Martinez Torres and Linda Davis (collectively, “Plaintiffs”), by and through their attorneys, file this unopposed motion to add Angel Alberio and Fernando Posso as additional plaintiffs in this case pursuant to Fed. R. Civ. P. 20. In support of this Motion, Plaintiffs state as follows:

1. On December 11, 2018, Plaintiffs filed a Complaint [ECF No. 1] seeking to represent a class of participants in several specified defined benefit retirement plans sponsored by American Airlines (the “Plans”).
2. Angel Alberio is a retired Plan participant who (along with his spouse) is receiving a 50% Joint & Survivor Annuity. Fernando Posso is a retired Plan participant who is receiving a 10-year Certain Annuity.
3. Angel Alberio and Fernando Posso have both retained Plaintiffs’ counsel to assert the same claims alleged in the Complaint against the same Defendants.

4. The parties agree that Angel Alberio and Fernando Posso may be joined as plaintiffs pursuant to Fed. R. Civ. P. 20(1)(1) because their claims arise from the same series of transactions or occurrences and/or involves questions of law and fact common to those asserted by Plaintiffs in the Complaint.

REQUESTED RELIEF

Plaintiffs request that the Court approve and enter an Order adding Angel Alberio and Fernando Posso as plaintiffs in this case and adding them to the caption pursuant to Fed. R. Civ. P. 20 as agreed to by the parties.

Dated: January 25, 2019

Respectfully submitted,

/s/ Joe Kendall

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Counsel for Plaintiffs

CERTIFICATE OF CONFERENCE

I hereby certify that on January 25, 2019, I conferred with Attorney Shannon Barrett, counsel for American Airlines, Inc., regarding the request sought in this Motion. He stated that he is unopposed to the relief requested in this Motion.

/s/ Seth R. Klein
SETH R. KLEIN

CERTIFICATE OF SERVICE

I hereby certify that on January 25, 2019, a true and correct copy of the foregoing motion was filed via the Court's CM/ECF system, in accordance with the Federal Rules of Civil Procedure. A copy was also served upon Shannon Barrett, attorney for American Airlines, Inc., via electronic mail.

/s/ Joe Kendall
JOE KENDALL